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UNITED STATES DISTRICT COURT

CLARK COUNTY, NEVADA

LISA ODISHO, an individual,

Plaintiff,

vs.

COSTCO WHOLESALE CORPORATION, dba
COSTCO, a foreign corporation; DOES I-X, and
ROE CORPORATIONS I-X, inclusive,

Defendant.

Case No. 2:23-cv-01196-JAD-MDC

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES
(FOURTH REQUEST)**

Pursuant to Fed. R. Civ. P. 6, Fed. R. Civ. P. 26, LR 26-1 and LR 26-4, Plaintiff, Lisa Odisho ("Plaintiff"), by and through her attorney of record, Paul D. Powell, Esq. and Jonathan Powell, Esq. of the law firm The Powell Law Firm and Defendant, Costco Wholesale Corporation ("Defendant"), by and through its attorneys of record, George M. Ranalli, Esq. and Maegun Mooso, ESQ. of the law firm Ranalli Zaniel Fowler & Moran, LLC, and hereby stipulate and agree to a ninety (90) day continuance of the current discovery deadlines to give the parties additional time to conduct discovery and discuss possible resolution. The instant Fourth Request is being filed after the denial of the Third Request, which requested clarification on certain issues. Furthermore, as discussed in Section III below, a deposition was not able to go forward, further necessitating the instant stipulation for extension.

I. DISCOVERY COMPLETED

1. Defendant served its Initial Disclosure Pursuant to FRCP 26(a)(1) on August 30, 2023;

2. Plaintiff served her Initial Disclosure Statement on September 5, 2023;
3. Defendant propounded its First Set of Interrogatories, Request for Admissions and Requests for Production of Documents to Plaintiff on October 24, 2023;
4. Defendant served its First Supplemental Disclosure Pursuant to FRCP 26(a)(1) on December 12, 2023;
5. Plaintiff served her responses to Defendant's First Set of Interrogatories, Request for Admissions and Requests for Production of Documents December 13, 2023;
6. Defendant served its Second Supplemental Disclosure Pursuant to FRCP 26(a)(1) on January 9, 2024;
7. Plaintiff served her First Supplemental Disclosure Statement on March 1, 2024;
8. Plaintiff served her Second Supplemental Disclosure Statement on March 20, 2024;
9. Plaintiff served her Third Supplemental Disclosure Statement on April 19, 2024;
10. Plaintiff served her Fourth Supplemental Disclosure Statement on May 16, 2024;
11. Plaintiff served her Fifth Supplemental Disclosure Statement on May 31, 2024;
12. Plaintiff served her First Set of Request for Production of Documents to Defendant on June 14, 2024;
13. Plaintiff served her First Set of Interrogatories and Second Set of Request for Production of Documents to Defendant on July 3, 2024;
14. Plaintiff served her Initial Designation of Expert Witnesses on July 26, 2024;
15. Defendant served its responses to Plaintiff's First and Second Set of Requests for Production of Documents on August 8, 2023;
16. Defendant took the deposition of Plaintiff on April 12, 2024;
17. Defendant served its responses to Plaintiff's First of Interrogatories to Defendant on September 5, 2024;
18. Defendant served its Initial Designation of Expert Witnesses and Documents on September 26, 2024; and

- 1 19. Defendant served its First Supplemental Designation of Expert Witnesses and
2 Documents on October 25, 2024.

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4 **II. DISCOVERY REMAINING TO BE COMPLETED**

- 5 1. Depositions of FRCP 30(b)(6) witnesses.
6 2. Expert witness depositions.
7 3. Additional written discovery as needed.

8 **III. REASONS WHY DISCOVERY SHOULD BE EXTENDED**

9 The parties have been diligently engaged in discovery thus far and wish to engage in
10 resolution discussions, including, but not limited to, a settlement conference and/or private
11 mediation. The parties wish to avoid unnecessary costs, fees and expenses in the interest of
12 potential resolution, in light of completed treatment and low damages. Additionally, while the
13 deposition of Plaintiff was completed, the scheduling took some time due to challenges in
14 scheduling for the parties, as well as for the Plaintiff, which caused delays later in the litigation.
15 Furthermore, the deposition of the 30(b)(6) witness for Defendant was set for November 21, 2024;
16 however, the deposition needed to be rescheduled due to the unavailability of that 30(b)(6) witness,
17 as he did not appear at the scheduled time. The parties are actively attempting to reschedule the
18 deposition but are unable to find dates within the current discovery deadline. Furthermore,
19 Defendant was attempting to diligently obtain certain documentation and information, some of
20 which has not been disclosed, with the remainder anticipated to be disclosed in the near future.

21 The parties respectfully suggests that good cause exists to continue discovery for a period of
22 ninety (90) day to permit the parties to further engage in settlement discussions, to allow for the
23 deposition of Defendant's 30(b)(6) witness to go forward, as it was properly set during discovery,
24 but now needs to be reset after the current discovery deadlines, and to allow for other discovery that
25 arises.

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PROPOSED SCHEDULE FOR COMPLETING REMAINING DISCOVERY

It is hereby stipulated that the discovery cutoff deadline be extended for a period of ninety (90) days. If approved, the new discovery deadlines would be modified as follows:

EVENT DEADLINE	CURRENT DATE	PROPOSED DATE
Close of Discovery	November 25, 2024	February 25, 2025
Initial Expert Disclosures	Closed	
Rebuttal Expert Disclosures	Closed	
Dispositive Motions	December 26, 2024	March 26, 2025
Joint Pre-Trial Order	January 24, 2025	April 24, 2025

IT IS SO STIPULATED AND AGREED.

Dated November 25, 2024.

Dated November 25, 2024.

THE POWELL LAW FIRM**RANALLI ZANIEL FOWLER & MORAN, LLC**/s/ Jonathan Powell/s/ Maegun Mooso

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Attorneys for Plaintiff

Attorneys for Defendant

ORDER

IT IS SO ORDERED.


 Hon. Maximiliano J. Couvillier III
 United States Magistrate Judge
 Date: 11/26/2024